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15
16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA

18
19 IN RE DRAM ANTITRUST LITIGATION

Master File No. M-02-1486 PJH (JCS)

20
21 MDL No. 1486

22
**STIPULATION AND [PROPOSED]
ORDER EXTENDING PRETRIAL
SCHEDULE AND TRIAL DATE**

23
24 This Document Relates to:

25 DIRECT PURCHASER CLASS ACTIONS

26
27 The parties to the consolidated direct purchaser actions hereby stipulate to, and respectfully
28 request that the Court grant, a two-month extension of the current pretrial schedule and trial date,

1 as follows, or on a similar schedule convenient for the Court, and on the terms and conditions set
 2 forth below:

3 **PROPOSED NEW SCHEDULE FOR DIRECT PURCHASER CASES**

4	May 17, 2006 (same)	Hearing on Motion for Class Certification.
5	July 12, 2006	Fact discovery closes (subject to conditions below)
6	July 26, 2006	Last date for plaintiffs to serve expert reports on merits.
7	August 23, 2006	Last date for defendants to serve expert reports on merits.
8	September 11, 2006	Last date for plaintiffs to serve rebuttal expert reports on merits.
9	September 28, 2006	Expert discovery closes.
10	October 11, 2006	Last date for filing dispositive motions.
11	November 13, 2006	Last date for oppositions to dispositive motions.
12	December 11, 2006	Last day for dispositive motions reply briefs.
13	January 5, 2007 ¹⁰	Hearing on dispositive motions. (9:00 am)
14	February 8, 2007	Last date for settlement conference.
15	February 8, 2007	Last date for filing motions in limine and other non-dispositive pretrial motions.
16	February 15, 2007	Last date to meet and confer re: pretrial order.
17	February 22, 2007	Parties must exchange proposed exhibit and witness lists.
18	February 22, 2007	Last date for filing pretrial order, agreed set of jury instructions and verdict forms, filing setting forth status of disputed instructions/verdict forms, etc.
19	February 22, 2007	Last date for filing oppositions to motions in limine.
20	March 5, 2007 ²²	Last date for filing motion in limine reply briefs.
21	March 12, 2007 ²²	Pretrial conference, hearing on motions in limine.
22	April 16, 2007 ²³	Trial begins.

26 With respect to the extension of the fact discovery deadline from May 12, 2006 to July 12,
 27 2006, the parties agree that the purpose of the extension is not to re-open discovery, but to permit
 28 the orderly taking or completion of the following:

1. Depositions that have been previously noticed and are either currently scheduled or that the parties have agreed will be taken after May 12, or where the noticing party used reasonable efforts to notice and schedule the deposition before May 12 but was unable to do so; any proposed depositions on which the parties cannot agree after meeting and conferring shall be decided by Magistrate Judge Spero.

2. The parties may take discovery of third party witnesses, i.e., persons who are not currently or formerly employed by any defendant.

3. The deadlines for the direct plaintiffs to respond to contention interrogatories served by certain defendants shall be extended by 6 weeks.

Dated: May 16, 2006

Respectfully submitted,

/s/ Guido Saveri

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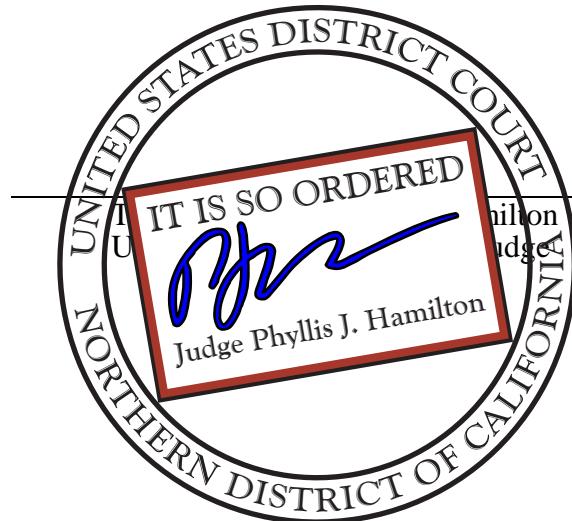
1
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15 IT IS SO ORDERED.
16

17 DATED: 5/19/06
18



CERTIFICATE OF SERVICE BY MAIL

In Re DYNAMIC RANDOM ACCESS MEMORY (DRAM) ANTITRUST LITIGATION
Case No. M-02-1486-PJH

I am over the age of 18 and not a party to the within action. I am employed in the County of San Francisco, State of California by Thelen Reid & Priest LLP. My business address is 101 Second Street, Suite 1800, San Francisco, California 94105-3606.

On May 16, 2006, I served the following entitled document:

**STIPULATION AND [PROPOSED] ORDER EXTENDING
PRETRIAL SCHEDULE AND TRIAL DATE**

by placing true and correct copies thereof in sealed envelopes addressed as follows:

SEE ATTACHED SERVICE LIST

I am readily familiar with the firm's business practice for collection and processing of correspondence for mailing with the United States Postal Service. On this day, I placed for collection and processing the above document to be deposited with the United States Postal Service in the ordinary course of business. And in the ordinary course of the firm's business, such correspondence is deposited with the United States Postal Service the same day that it is collected.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 16, 2006, at San Francisco, California.

/s/ Camellia Gamble

Camellia Gamble

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